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February 15, 1996

VIA HAND DELIVERY

William F. Caton, Acting Secretary
Federal Communications Commission
1919 M Street N.W., Room 222
Washington, D.C. 20554

Attn: Wireless Telecommunications Bureau

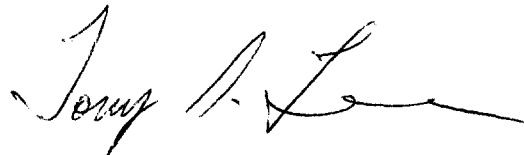
Re: PR Docket No. 93-144, RM-8117, RM-8030, RM-8029
GN Docket No. 93-252
PP Docket No. 93-253

Dear Mr. Caton:

On behalf of Telecellular de Puerto Rico, Inc., there are hereby submitted an original and four copies of the enclosed Comments in response to the Commission's Second Further Notice of Proposed Rulemaking released on December 15, 1995 in the above referenced dockets.

If there are any questions, please contact us at (202) 371-1078.

Respectfully submitted,



Tony S. Lee

Enclosures

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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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In the Matter of)	
)	
Amendment of Part 90 of the)	PR Docket No. 93-144
Commission's Rules to)	RM-8117, RM-8030
Facilitate Future Development)	RM-8029
of SMR Systems in the)	
800 MHz Frequency Band)	
)	
Implementation of Sections)	GN Docket No. 93-252
3(n) and 322 of the)	
Communications Act Regulatory)	
Treatment of Mobile Services)	
)	
Implementation of Section)	PP Docket No. 93-253
309(j) of the Communication)	
Act -- Competitive Bidding)	

To: Wireless Telecommunications Bureau

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COMMENTS

Telecellular de Puerto Rico, Inc. ("Telecellular"), by its attorneys, submits the following comments in response to the Commission's Second Further Notice of Proposed Rulemaking ("FNPRM") released on December 15, 1995 in the above-captioned dockets.

Telecellular filed comments in this proceeding on January 16, 1996, prior to the extension of the comment date. Telecellular, a joint venture that has received extended implementation authority to construct a wide area 800 MHz SMR system in Puerto Rico, would like to reiterate the point made in its previously filed comments. Specifically, the final rules for determining eligibility to bid for Economic Area ("EA") licenses on the Lower 80 Channels should include two types of eligible entities without reference to financial cap limits. First, any incumbent five-channel block licensee in the Lower 80 should be eligible to bid for the same five-channel EA license associated with the EA where the incumbent

holds its existing license. Second, any entity with current extended implementation authority likewise should be eligible to bid for the same five-channel EA licenses associated with the existing licenses which are under such extended implementation authority, as well as for any five-channel EA license that is adjacent to such license.

If incumbents and entities with extended implementation authority on Lower 80 Channels are not afforded eligibility irrespective of the financial caps, they will be unfairly excluded by the set aside. In Telecellular's case, the anomalous situation could arise in which Telecellular obtains EA licenses on the Upper 200 channels it already occupies, but cannot obtain such licenses on its occupied Lower 80 channels, creating burdens and complications for its build-out of a wide area system that uses both types of channels.

Further, the Commission should create GX Channel blocks having the same number of channels, i.e., six equal 25-Channel blocks. Such a grouping will eliminate a contentious issue that a relocated Upper 200 Channel incumbent could raise, namely that one GX Channel block is better than another because it contains more channels. The Commission should do everything possible to avoid creating problematic issues for the negotiations between EA licenses and incumbents who are being relocated to GX Channels. Making the GX Channel blocks equal would eliminate one such issue.

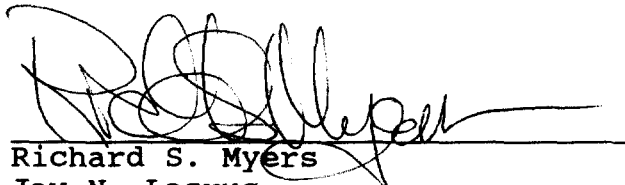
Telecellular also believes that non-SMR licensees operating on the Lower 80 and GX Channels should be relocated to non-SMR

channels pursuant to the same relocation rules and principles applied to Upper 200 Channel incumbents. Doing so would help ensure that the 800 MHz SMR band is being used most fully for its intended purposes as licensees in this band make the transition to wide area systems.

At paragraphs 386-388 of the FNPRM, the Commission proposed to adopt reduced upfront payments for small businesses bidding for Lower 80 and GX Channel licenses. Telecellular supports that proposal. The reduced upfront payment should be \$.015 per activity unit.

Respectfully submitted,
TELECELLULAR DE PUERTO RICO, INC.

By:



Richard S. Myers
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Tony S. Lee

Its Attorneys

February 15, 1996

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